

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with Enhanced 911)	
Emergency Calling Systems)	
)	
Phase II Compliance Deadlines for Non-)	
Nationwide CMRS Carriers)	
)	

To: The Commission

THIRD INTERIM REPORT REGARDING E911 PHASE II DEPLOYMENT
OTZ TELECOMMUNICATIONS, INC.

OTZ Telecommunications, Inc. ("OTZ") hereby submits this Third Interim Report on E911 Phase II deployment as required by the Commission's *Waiver Order*.¹ OTZ is a Tier III wireless carrier that had previously sought additional time to comply with the Commission's E911 Phase II rules and was subject to the limited relief afforded to certain Tier III carriers by the *Stay Order*² and the *Non-Nationwide Carrier Order*.³

In the *Waiver Order* the FCC granted temporary relief to a number of carriers, including OTZ, who had originally elected to pursue a handset-based solution to E911 Phase II location capability requirements. The Commission also required these carriers to submit an Interim Report by September 1, 2005, to provide updated information on their efforts to meet the handset deployment requirements of section 20.18(g) of the Commission's rules.

By report dated July 5, 2005 and submitted pursuant to section 20.18(i) of the rules, OTZ notified the Commission that it has chosen to pursue a network-based solution

¹ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket 94-102, Order, FCC 05-79 (rel. April 1, 2005) (*Waiver Order*).

² *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket 94-102, Order to Stay, FCC 03-241 (rel. October 10, 2003) (*Stay Order*).

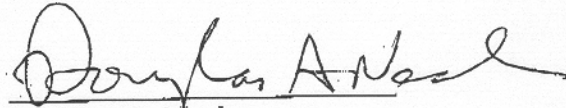
³ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order to Stay, FCC 02-210 (rel. July 26, 2002) (*Non-Nationwide Carrier Order*).

to provide E911 location capable services to its customers. Because OTZ has chosen to pursue a network-based solution, it is no longer subject to the handset benchmarks established in the *Waiver Order*. OTZ has not received any Phase I or Phase II PSAP requests. Accordingly, until it receives such a request, OTZ does not have a timetable for its provision of Phase II E911.

DECLARATION OF DOUGLAS A. NEAL

I, Douglas A. Neal, do hereby declare under penalty of perjury the following:

1. I am Chief Executive Officer of OTZ Telecommunications Inc.
2. I have read the foregoing "Third Interim Report Regarding E911 Phase II Deployment." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.


Douglas A. Neal

8-16-05
Date